

EXHIBIT B-1

**UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA**

AL'S DISCOUNT PLUMBING;
ACCURATE BACKFLOW AND
PLUMBING SERVICES, INC.;
HOMESTEAD HEATING &
PLUMBING, LLC; AIRIC'S
HEATING & AIR CONDITIONING,
INC.; PRIME SOURCE PLUMBING
& HEATING CORP.; RYAN
PLUMBING, INC.; MAZZOLA
PLUMBING HEATING & GAS
FITTING, INC.; SOUTH SHORE
HEATING AND PLUMBING, INC.;
ALL KNIGHT PLUMBING,
HEATING AND AIR
CONDITIONING, INC.; PLUMB
PERFECTION, LLC, individually and
on behalf of all others similarly situated,

Plaintiffs,

v.

VIEGA LLC,

Defendant.

Case No: 19-cv-00159

Honorable Christopher C. Conner

Electronically Filed

**DECLARATION OF SHPETIM ADEMI IN SUPPORT OF PLAINTIFF'S UNOPPOSED
MOTION FOR FINAL APPROVAL OF SETTLEMENT AND ATTORNEYS' FEES,
EXPENSES AND SERVICE AWARD**

I, Shpetim Ademi, Esq., hereby declare and state as follows:

1. I am a partner at the law firm of Ademi LLP, successor to Ademi & O'Reilly LLP, (the "Firm"). I submit this declaration in support of Plaintiffs' Motion for Final Approval of Settlement and Attorneys' Fees, Expenses and Service Award. I have personal knowledge of the information set forth in this Declaration.

2. Over the course of this Action, Counsel have successfully navigated Plaintiff and the Class through a fully briefed motion to dismiss, nearly complete discovery of class representatives, extensive merits discovery, and mediation resulting in settlement.

3. The attorneys from my Firm that have worked on this Action are: Guri Ademi. Shpetim Ademi, Robert K. O'Reilly, John Blythin, Mark Eldridge, Denise Morris, Jesse Fruchter and Ben Slatky. Under the direction of Interim Class Counsel, the Firm undertook the following assignments:

- The Firm represents AI's Discount Plumbing in the above matter;
- Meetings and calls with client about possible antitrust case. Investigation of the underlying facts and causes of action respecting claims against Viega;
- Drafting and preparation of summons, complaint and other initiating documents filed in the Eastern District of Wisconsin;
- Review of MDL filing and transfer of case from E.D. of Wisconsin to Pennsylvania and MDL filing reviews;
- Coordination with counsel for other plaintiffs and eventual lead counsel regarding organizational structure of the case;
- Attend hearing on case management and counsel organization;
- Assistance in drafting of Consolidated Amended Complaint; Review and complete lead questionnaire with client;
- Review of pleadings throughout case including motion to dismiss and reports of status to client;

- Assignment by lead as one of a few dedicated document reviewers over the course of 6 months, review of tens of thousands of documents produced by Defendant; preparation of batch memos, prepare and attend weekly calls w/ lead counsel;
- Schedule meetings with client; Draft discovery responses for, interrogatories, request for production and meetings with client respecting productions, assemble and review client productions and produce to lead counsel;
- Review of liability memos throughout case, calls and emails with lead counsel;
- Schedule meetings with clients; Schedule deposition; preparation and defense of prospective class representative's deposition, review deposition transcripts;
- Review proposed settlement terms and discuss with client, assist client with claim form and further review of purchases and documents thereto.

4. Not including the time expended in preparing the application for fees and expenses, the table below details the hours billed and the amount billed at average historical rates for these attorneys along with a collective entry for the Firm's paralegals:¹

<u>Attorney</u>	<u>Hours Billed</u>	<u>Amount</u>	<u>Hourly Rate</u>
Guri Ademi	.3	\$240.00	\$800.00
Shpetim Ademi	72.5	\$54,375.00	\$750.00
Robert K. O'Reilly	.1	\$75.00	\$750.00
John Blythin	50.3	\$23,987.50	\$475.00
Mark Eldridge	90.3	\$37,528.50	\$425.00
Denise Morris	2.4	\$1,020.00	\$425.00
Denise Morris (Doc Review Rate)	883.5	\$265,050.00	\$300.00
Jesse Fruchter	4.0	\$1,500.00	\$375.00
Ben Slatky	21.1	\$7,912.50	\$375.00
<u>TOTALS</u>	1124.5	\$391,688.50	

This summary was prepared from contemporaneous, daily time records regularly prepared and maintained by my firm.

¹ If the Court wishes, the Firm can provide more detailed time entries describing the work of these attorneys, as well as the Firm's expenses.

5. The hourly rates for the attorneys and professional support staff at my firm are the usual and customary hourly rates charged and have been approved by federal and state courts nation-wide.

6. During the course of this Action, the Firm incurred \$1807.71 in unreimbursed billable expenses. These expenses were incurred and tracked in the Firm's normal course of business. The chart below details the expenses incurred by category:

CATEGORY	EXPENSE AMOUNT
Copying, Printing and Scanning	\$659.30
Telephone and Conference Calls	\$16.07
Messenger and delivery services	0
Service of Process	0
Carfare, Travel and Meals	\$402.62
Expert Fees	0
Court Reporters and Transcripts	0
Legal Research and Filing Fees	\$729.72
Mediators	0

I hereby declare under penalty of perjury that above is true and correct to the best of my knowledge.

Dated: November 3rd, 2020

S/ SHPETIM ADEMI